

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

VOLKSWAGEN GROUP OF AMERICA, INC.,

Plaintiff,

v.

Civil Action No. 1:19-cv-01574-AJT-MSN

**THE UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE A,**

Defendants.

**NOTICE OF AGREED STIPULATED DISMISSAL WITH PREJUDICE
AS TO CERTAIN DEFENDANTS**

Plaintiff Volkswagen Group of America, Inc. (“Plaintiff”) and certain Defendants have agreed to terms and conditions representing a negotiated settlement of this action and have set forth those terms and conditions in a Confidential Settlement Agreement. Now the parties hereby move for an order dismissing all claims in this action asserted between them with prejudice.

This dismissal only pertains to the Defendants indicated herein and does not constitute a dismissal of all Defendants. The parties hereby agree to waive a hearing on this Motion. The defendant number provided corresponds to the Defendants’ information in Schedule A to the Verified Complaint (“Schedule A”):

No.	Defendant Name	Seller ID/Defendant Store	Defendant Email
2	景 王 (Wang Jing)	5457426	wangjing0928@outlook.com
4	坤 雷 (Kun Lei)	allway-auto-us	info@allway-auto.com
21	光 军 程 (Guang Jun Cheng)	developower2018	lynsey@cosuper.com
31	义 德 胡 (Hu Yide)	ediy_hu Car Accessory Purchasing Center	hkcysea@gmail.com

34	文婉屈 (Wen Wan Qu)	fomall	iai2016@163.com
35	景王 (Wang Jing)	fusq2293	2529409604@qq.com
42	桂方李 (Gui Fang Li)	itobddiag	fang@itcardiag.com
49	亮余 (Yu Liang)	maketrust2016	yuliang2895@163.com
73	小勇祝 (Xiao Yong)	zcdeal2015	zcdeal@outlook.com

Date: March 16, 2020

Respectfully submitted,

/s/ Monica Riva Talley

Monica Riva Talley (VSB No. 41840)

Daniel E. Yonan (VSB No. 46019)

Nicholas J. Nowak (*pro hac vice*)

Daniel S. Block (*pro hac vice*)

STERNE KESSLER GOLDSTEIN & FOX, PLLC

1100 New York Ave., N.W., Suite 600

Washington, DC 20005-3934

Telephone No.: (202) 371-2600

Facsimile No.: (202) 371-2540

mtalley@sternekessler.com

dyonan@sternekessler.com

nnowak@sternekessler.com

dblock@sternekessler.com

Attorneys for Plaintiff